

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG
RESOURCES LIMITED,

Plaintiffs,

v.

No. 1:17-cv-02726 (JFK) (AJP)

GEORGE SOROS, OPEN SOCIETY
FOUNDATIONS, OPEN SOCIETY
INSTITUTE, FOUNDATION TO PROMOTE
OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL, INC., OPEN
SOCIETY POLICY CENTER, and OPEN
SOCIETY FUND,

Defendants.

**[PROPOSED] ORDER ISSUING A LETTER OF REQUEST (LETTER ROGATORY)
FOR THE PRODUCTION OF DOCUMENTS IN THE REPUBLIC OF FRANCE
PURSUANT TO THE HAGUE EVIDENCE CONVENTION**

Upon consideration of the application (the “Application”) of Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund, requesting the issuance of a letter of request (“Letter Rogatory”) pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, 23 U.S.T. 2555, 847 U.N.T.S. 231 (the “Hague Evidence Convention”) to which both the Republic of France and the United States are parties, 28 U.S.C. § 1781, and Rules 4(f) and 28 of the Federal Rules of Civil Procedure; and upon the record of these civil proceedings; and due and sufficient notice having been given under the circumstances; and it

appearing that no other or further notice need be given; and after due deliberation; and it appearing that good and sufficient cause exists;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is GRANTED.
2. This Court shall sign the Letter Rogatory attached to the Application as Exhibit B and affix the seal of the United States District Court for the Southern District of New York over said signature in the Letter Rogatory.
3. The Clerk of the Court is directed to return the original, signed Letter Rogatory to Joseph T. Baio of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, so that said documents may be transmitted to the Ministère de la Justice acting as the Central Authority of the Republic of France.
4. Joseph T. Baio of Willkie Farr & Gallagher LLP is directed to transmit the original, signed Letter Rogatory to the Central Authority of the Republic of France.
5. The Court shall retain jurisdiction over any and all issues arising from or relating to the implementation and interpretation of this order.

Dated: _____, 2017
New York, New York

THE HONORABLE ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE